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July 11, 2023

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (NGG)

Dear Judge Donnelly:

On behalf of Douglass Mackey, I write to request permission to file a reply memorandum of law in excess of the Court's standard ten pages. The current draft is roughly proportionate to the length of the parties' initial briefs, each of which was about 35 pages. I expect the reply memorandum to be between 16 and 20 pages after final editing. I believe that the oversized reply will assist the Court in resolving the motions.

I apologize for filing this letter after hours, but I emailed the government this morning to confirm that it has no objection, but have not yet heard back.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Andrew J. Frisch
Andrew J. Frisch

cc: United States Attorney's Office